ORDNANCE SYSTEMS INC. 4509 West Stone Drive Kingsport, Tennessee 37660-9982 Telephone (423) 578-8010 Fax (423) 578-8054

> In Reply Reference 2804RO Federal Express Tracking Number: 7986 1827 2620

July 13, 2012

Mr. Barry Stephens, Director
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
9th Floor L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

Reference: BAE Systems Ordnance Systems Inc., Holston Army Ammunition Plant, Information

Requested by TDEC for Open Burning Ground Sources 37-0028-10 and 37-0028-53.

Dear Mr. Stephens:

BAE Systems Ordnance Systems Inc. (OSI), operating contractor for Holston Army Ammunition Plant (HSAAP) in Kingsport, respectfully submits this summary of current activities at the site's open burning grounds (sources 37-0028-10 and 37-0028-53) and the steps taken to prevent pollution from these activities from affecting areas offsite. These burning ground activities are necessary to satisfy safety and security requirements of the U.S. Army. This summary will cover four main points:

- Layout and Current Status of the Open Burning Grounds
- Extra measures taken to ensure compliance with the Title V Permit
- Recent projects status involving the open burning grounds and projected timeframe of completion
- Recent technology reviews completed by the Army

At the end of this correspondence I would hope that it is apparent that OSI and the Army recognize the potential environmental effects of the open burning of waste explosives and explosives contaminated material and successfully maintain a balance between protecting the environment and the safe and secure handling of this material to ensure that this crucial facility continues to supply safe, effective, and versatile energetic products needed to support our armed forces.

Layout and Current Status of the Open Burning Grounds

The waste explosives and explosives contaminated material open burning (OB) area is located at the HSAAP Area B facility in Hawkins County. The OB area is located approximately 0.85 Miles from the closest facility boundary and approximately 1.5 miles from the closest resident. The activities at





Page 2 of 4

the OB area are permitted through Title V Air Permit 558406 and the pans are permit ted by a RCRA Subpart X Permit. All storm water runoff is collected and diverted to the onsite NPDES permitted waste water treatment facility. This summary only references the Title V Air Permit 558406 conditions as these are the only requirements related to air quality.

There are three main types of wastes. The first is bulk raw explosives that have become contaminated through contact with the manufacturing floor or out-of-spec product unsuitable for use or reprocessing. This waste is burned normally each week in burn pans. The explosive material combusts rapidly and very completely at a high temperature; producing very little visible emissions. The second type of waste consists of explosives-contaminated small articles such as plastic bags, paper towels, filters, personal protective equipment, and dewatering filter socks. This material is placed in a steel cage and is generally burned once a week even though it is permitted daily. Visible emissions are observed from this activity but usually the cage material combusts quickly. The third type of waste is large articles that may be contaminated with explosives and includes various materials, piping from buildings, process vessels, building demolition material including concrete, and possibly soil surrounding these areas. This material is placed in large piles at the burning ground and burned quarterly as permitted and produces visible emissions for a longer period. Since many of the materials that are required to be thermally decontaminated are not combustible, large amounts of clean wood are used along with small quantities of kerosene or diesel to facilitate the burning of pile material. Much of the visible emissions come from this material. This allows the material to reach the required temperatures for the required duration to ensure that these materials can be transported safely.

All explosive contaminated materials must be disposed of in accordance with the requirements of the Department of the Army Technical Bulletin 700-4 for Decontamination of Facilities and Equipment, which is by burning. Currently, no other safe alternative method can be utilized to meet the desired level of decontamination for safe handling of the material.

OSI operates the OB area in accordance with Title V Permit 558406. Only material meeting the characteristics of Conditions E5-3 and E26-3 from onsite is burned at the area in accordance with Conditions E5-5 and E26-5. Records required by Conditions E5-4 and E26-4 demonstrating compliance with Conditions E5-1, E26-1, and E26-2 are maintained and are included for 2012 as an attachment. Records are also maintained for Conditions E5-2 and E26-1 specifically to address air dispersion conditions. These conditions were established to ensure that acceptable pollutant dispersion conditions are present. OSI receives advance approval from the Division of Air Pollution Control's Johnson City Environmental Field Office for all quarterly pile burns. OSI has always followed the requirements of the permit by monitoring weather service bulletins to ensure there are no air stagnation advisories nor any EPA Air Now ozone or PM2.5 action days for the selected burn dates. However, since the quarterly burns have the potential for the highest emissions, OSI has recently taken extra measures by documenting fire weather data to ensure that the best possible pollutant dispersion conditions are present when selecting a date for the quarterly burns. At no time is any of the material burned during either an air stagnation advisory in East Tennessee or an EPA action day.





Extra Measures Taken to Ensure Compliance with the Title V Permit

In conjunction with Liesa R. Elliott, consulting meteorologist, an Excel-based tool was developed which uses information from the National Weather Service (NWS) bulletins, EPA's Air Now website, and data from the NWS fire weather website to calculate an air dispersion ventilation rate. A letter discussing this tool from Ms. Elliot is attached to this correspondence. The pile burns for the first two quarters were conducted during excellent and good dispersion conditions which allowed the plumes from these burns to be very visible from the surrounding area. Copies of the fire weather data screenshots and the calculation tool for the last two pile burns are attached for your review.

Recent projects status involving the open burning grounds and projected timeframe of completion

Over the past several years OSI and the Army have been working on removing inoperable and decommissioned equipment and structures from the site to create a better working environment and reduce the safety, security, and environmental risks with having these types of facilities on site. This has been a multi-year project and is approximately 50% complete. This has resulted in a slight increase in the amount of pile burns during the year. The burn events went from approximately two per year to four per year as permitted. The estimated completion date for the second phase of the demolition projects is in approximately three years.

Recent technology reviews completed by the Army

A March 2012 report (ERDC/EL TR-12-8) titled Alternative Treatment Options for Open Burning of Explosive Waste at Holston Army Ammunition Plant was the latest technology review conducted. Technology was reviewed for all three types of wastes currently burned at the open burning grounds. This report was prepared for the Program Manager, Joint Services, U.S. Army Research, Development and Engineering Center, Picatinny Arsenal, NJ. It includes the results of Work Unit A1040, Modernization of Industrial Base. The research was conducted by the U.S. Army Engineer Research and Development Center (ERDC)-Environmental Laboratory (EL), Vicksburg, MS, under the sponsorship of the U.S. Army Armament, Research, Development and Engineering Center (ARDEC), Picatinny Arsenal and the U.S. Army ARDEC Program Executive Office for Ammunition, Heavy Metals Office, Picatinny Arsenal.

Five commercially available technologies were evaluated with the most important consideration in the comparison being the safety profile of the system. One of the five was not considered proven to be safe and reliable for any of the waste streams at HSAAP. Of the remaining four technologies two could not be used at all for the bulk contaminated wastes and the final two could only treat the bulk materials if they were first processed through grinding. The grinding technology was not evaluated and at this point there is little information on safe and technically feasible technologies that could safely preprocess the bulk materials that currently go on the piles or the cages. It is likely that each type of waste would require a separate type of technology. The explosives waste that has the fewest emissions



appears to have other safe alternatives to open burning. However, currently because of the preprocessing step there are no other safe alternatives to open burning of the pile and cage waste.

Mr. James Ogle serves as BAE Systems OSI's primary contact for air program issues and may be reached at (423) 578-6231 or by email at james.ogle@baesystems.com. Please do not hesitate to contact Mr. Ogle should questions arise or additional information be needed.

Sincerely,

BAE SYSTEMS Ordnance Systems Inc.

R.E. Winstead

Environmental Manager

Reviewed by HSAAP Staff

cc Environmental Affairs/Ogle HSAAP/Vestal

Environmental Affairs Files 1305/2012

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BAE SYSTEMS Ordnance Systems Inc. HSAAP Title V Permit

Source #37-0028-10 Open Burning of Explosives Contaminated Waste

Permit #558406 (Superceeded #547362) Conditions E5-1 and E5-4

January through December 2012 Reporting Period

Condition E5-1: "This source shall only operate during the hours between 08:30 AM and 7:30 PM daily and shall not be operated in excess of 400 hours per year."

Condition E5-4: "The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division personnel. ."

Compliance Demonstration: Recordkeeping of Open Burning Activity

Limitation: 400 hours per year

	Explosive Contami	nated Was	te (Cages)		
Burn #	Date of Burn	Start	Hours	Minutes	Duration
		Time			(hours)
1	01/06/2012	835	2	0	2.0
2	01/13/2012	900	1	0	1.0
3	01/20/2012	1030	1	0	1.0
4	01/27/2012	1400	2	0	2.0
5	02/03/2012	1100	2	0	2.0
6	02/10/2012	900	2	0	2.0
7	02/17/2012	910	2	0	2.0
8	03/01/2012	930	2	0	2.0
9	03/13/2012	1405	2	0	2.0
10	03/16/2012	915	2	0	2.0
11	03/23/2012	940	2	0	2.0
12	04/03/2012	1300	2	0	2.0
13	04/23/2012	1100	2	0	2.0
14	05/07/2012	1250	2	0	2.0
15	05/30/2012	1500	2	0	2.0
16	06/11/2012	1230	2	0	2.0
17	06/13/2012	1200	2	0	2.0
,					
	Total Burn Time	(hours)			32.0

Explosive Contami	nated Was	te (Pile)		
Date of Burn	Start	Hours	Minutes	Duration
	Time			(hours)
3/28/2012	1000	24	0	24.0
6/25/2012	1320	36	0	36.0

			4	
Total Burn Time	(hours)			60.0

Overall CY Period (hours)		92.0
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Overall Burn Limit	(hours)	
per year	(Hours)	400.0

BAE SYSTEMS Ordnance Systems Inc. HSAAP Title V Permit

Source #37-0028-53 Open Burning of Explosive Wastes

Title V Permit 558406 - Conditions E26-1, E26-2, and E26-4 (Previously Permit #547362 - Conditions E31-1, E31-2, and E31-4)

January through December 2012 Reporting Period

Sequel Burn Report Link

<u>Condition E26-1:</u> "Open burning of explosive waste shall be conducted between the hours of 12:00 (noon) and 4:00 PM . . ."

Condition E26-2: "This source shall not be operated in excess of 1300 hours per year."

Condition E26-4: "The owner or operator of this source with restricted operating hours must maintain a daily log of operating hours and keep it available for inspection by Division

Compliance Demonstration: Recordkeeping of Burning of Explosives

Limitation: 1300 hours per year

	000000000000000000000000000000000000000	Explosive Was	te Burns	***************************************
Burn	Date of Burn	Start Time	Minutes	Duration
Number				(hours)
1	1/4/2012	1410	30	0.50
2	1/10/2012	1345	30	0.50
3	1/11/2012	1410	20	0.33
4	1/13/2012	1420	15	0.25
5	1/16/2012	1420	30	0.50
6	1/18/2012	1315	30	0.50
7	1/30/2012	1440	50	0.83
8	1/31/2012	1430	20	0.33
9	2/6/2012	1330	50	0.83
10	2/7/2012	1345	35	0.58
11	2/8/2012	1215	30	0.50
12	2/15/2012	1410	30	0.50
13	2/16/2012	1530	20	0.33
14	2/17/2012	1300	30	0.00
15	2/18/2012	1301	25	0.42
16	2/26/2012	1335	35	0.58
17	3/6/2012	1250	20	0.33
18	3/12/2012	1330	30	0.50
19	3/23/2012	1300	20	0.33
20	4/2/2012	1245	45	0.75
21	4/3/2012	1215	30	0.50
22	4/4/2012	1230	30	0.50
23	4/12/2012	1315	30	0.50
24	4/13/2012	1245	30	0.50
25	4/25/2012	1215	15	0.25
26	5/2/2012	1250	30	0.50
27	5/7/2012	1325	30	0.50
28	5/10/2012	1455	30	0.50
29	5/18/2012	1500	20	0.33
30	5/21/2012	1410	20	0.33
31	5/22/2012	1345	20	0.33
32	5/23/2012	1400	20	0.33
33	5/24/2012	1305	20	0.33
34	5/25/2012	1215	30	0.50

		Explosive Was	000000000000000000000000000000000000000	
Burn	Date of Burn	Start Time	Minutes	Duration
Number				(hours)
35	5/31/2012	1340	20	0.33
36	6/4/2012	1400	20	0.33
37	6/5/2012	1345	20	0.33
38	6/6/2012	1205	30	0.50
39	6/7/2012	1210	15	0.25
40	6/8/2012	1230	15	0.25
41	6/11/2012	1200	30	0.50
42	6/12/2012	1200	30	0.50
43	6/13/2012	1200	30	0.50
44	6/14/2012	1230	30	0.50
45	6/15/2012	1500	45	0.75
46	6/17/2012	1300	20	0.33
47	6/18/2012	1330	20	0.33
48	6/25/2012	1240	20	0.33
49	6/26/2012	1410	20	0.33
50	6/28/2012	1405	15	0.25
51	7/2/2012	1405	20	0.33
52	7/3/2012	1405	35	0.58
	Total Burn Time This Period (Hours)			22.5
		Burn Time Li	mit (Hours)	1300.0

3/26/2012

. . .

Liesa R. Elliott 6065 Frontier Lane, Suite 200 Nashville, Tennessee 37211

Mr. James Ogle BAE Systems OSI Holston Army Ammunition Plant 4509 West Stone Drive Kingsport, TN 37660

Dear Jimmy:

It is my understanding that you need a way to verify that the weather at the Holston Army Ammunition Plant in Kingsport, Tennessee, for each of the selected burn dates of March 27-30, are conducive for adequate air dispersion to meet the following permit condition from your Title V Permit No. 558406.

Condition E5-2 states:

It is recognized that there are two categories of explosive contaminated materials open burning. The following procedures shall be adhered to in determining whether or not acceptable pollutant dispersion conditions are present:

- (a) Daily open burning of trash container waste in the cage receptacle will not be permitted in the instance of an air stagnation advisory in East Tennessee. It will be the responsibility of the permittee to monitor the local National Oceanic and Atmospheric Administration's Weather Service Office bulletins to determine if acceptable pollutant dispersion conditions are present
- (b) Quarterly open burning of explosive contaminated materials not appropriate for burning in the cage receptacle shall be conducted only upon advance approval for each burn from the Division Air Pollution Control's Johnson City Environmental Field Office. Under no circumstances shall the permittee open burn during an air stagnation advisory in East Tennessee.

TAPCR 1200-3-4-.04(1)(h), 1200-3-4-.04(1)(k) & 1200-3-19-.05(2)

. . .

You and I worked together to develop a spreadsheet tool (see attached file) to indicate air dispersion conditions.

The spreadsheet utilizes the following criteria for acceptable dispersion conditions and burn recommendation:

- No fire, air pollution action day or air stagnation warnings,
- Calculated ventilation rates greater than 60,000 kt-ft. The ventilation rate is the mixing height multiplied by the transport wind speed, as provided by the National Weather Service (NWS) fire weather forecast. Ventilation rates greater than 60,000 kt-ft are considered good to excellent conditions for smoke dispersion,
- Predicted surface winds are equal to or greater than 5 mph during daylight hours as provided by the NWS fire weather forecast,
- Predicted surface wind gusts are equal to or less than 25 mph as provided by the NWS fire weather forecast, and
- Predicted 6-hour accumulated precipitation amounts are equal to or less than 0.05 inches as provided by the NWS fire weather forecast.

The spreadsheet tool user is cautioned if the Haines Index (HI) is greater than 5, which indicates a moderate or high potential for large fire growth. The user is also cautioned if there is any amount of precipitation predicted for the day.

It is my opinion as an Air Quality Consulting Meteorologist, that the spreadsheet tool will meet your permit conditions and indicate adequate dispersion conditions. This tool would be applicable to use for the burn dates requested, as well as future burn dates as needed by your facility.

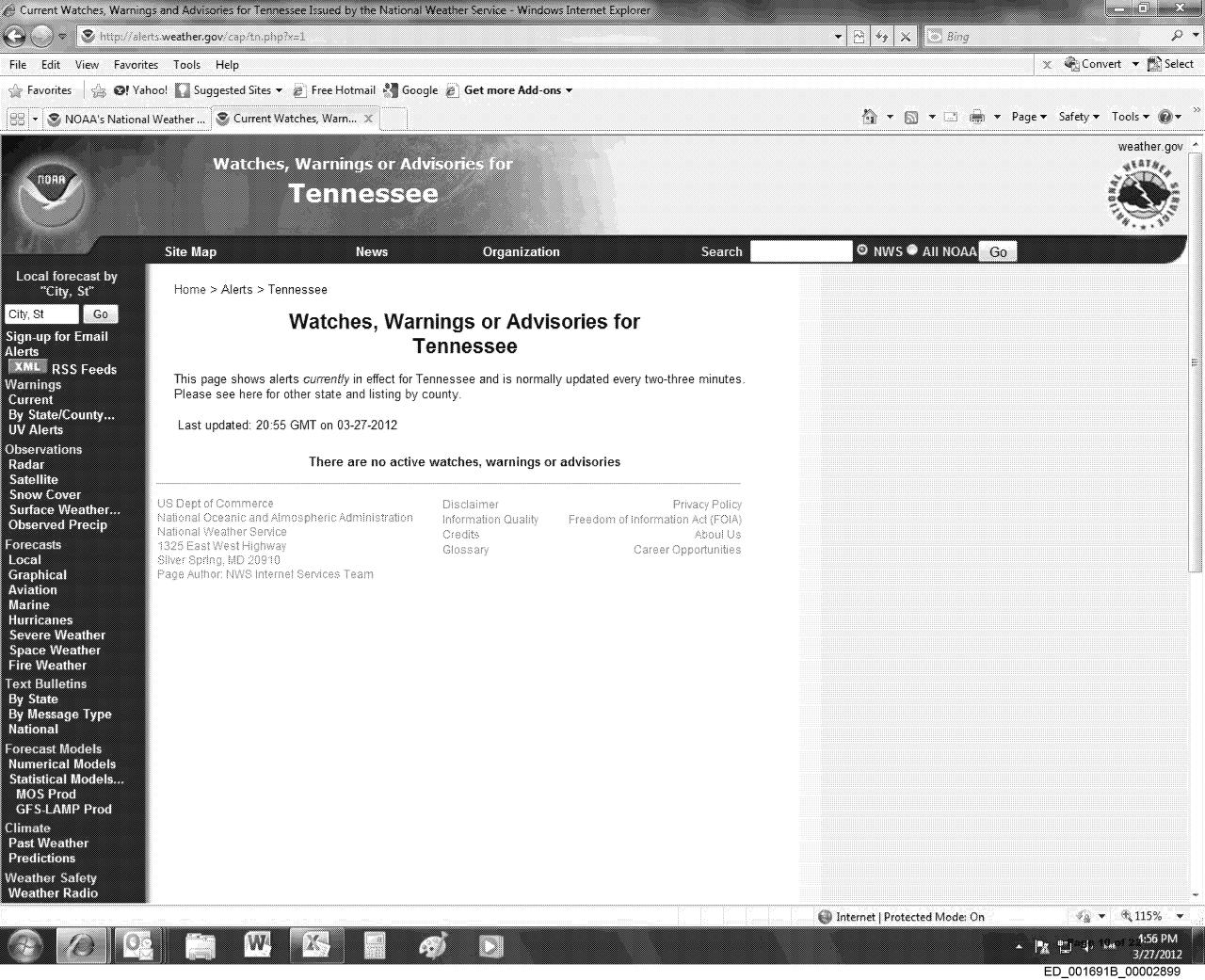
I sincerely appreciate the opportunity to work with you again, and look forward to additional collaborations in the future.

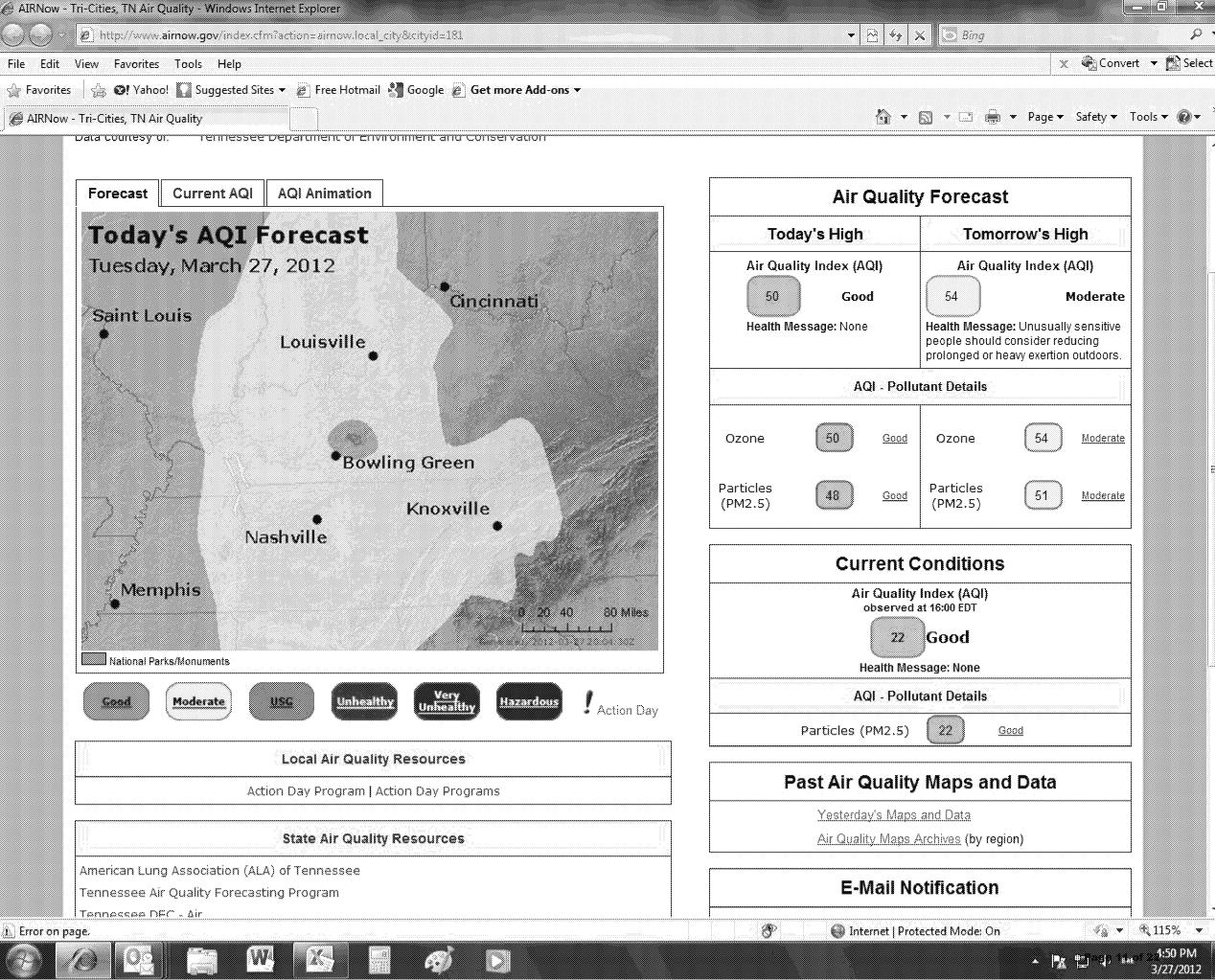
Best Regards,

Liesa R. Elliott

Consulting Meteorologist

Liesa R. Elliott





Routine Fire Wx Fcst (With/Without 6-10 Day Outlook) Tennesee Forestry District 1

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FIRE WEATHER PLANNING FORECAST FOR EAST TENNESSEE...SOUTHWEST VIRGINIA...AND EXTREME SOUTHWEST NORTH CAROLINA NATIONAL WEATHER SERVICE MORRISTOWN TN 305 PM EDT TUE MAR 27 2012

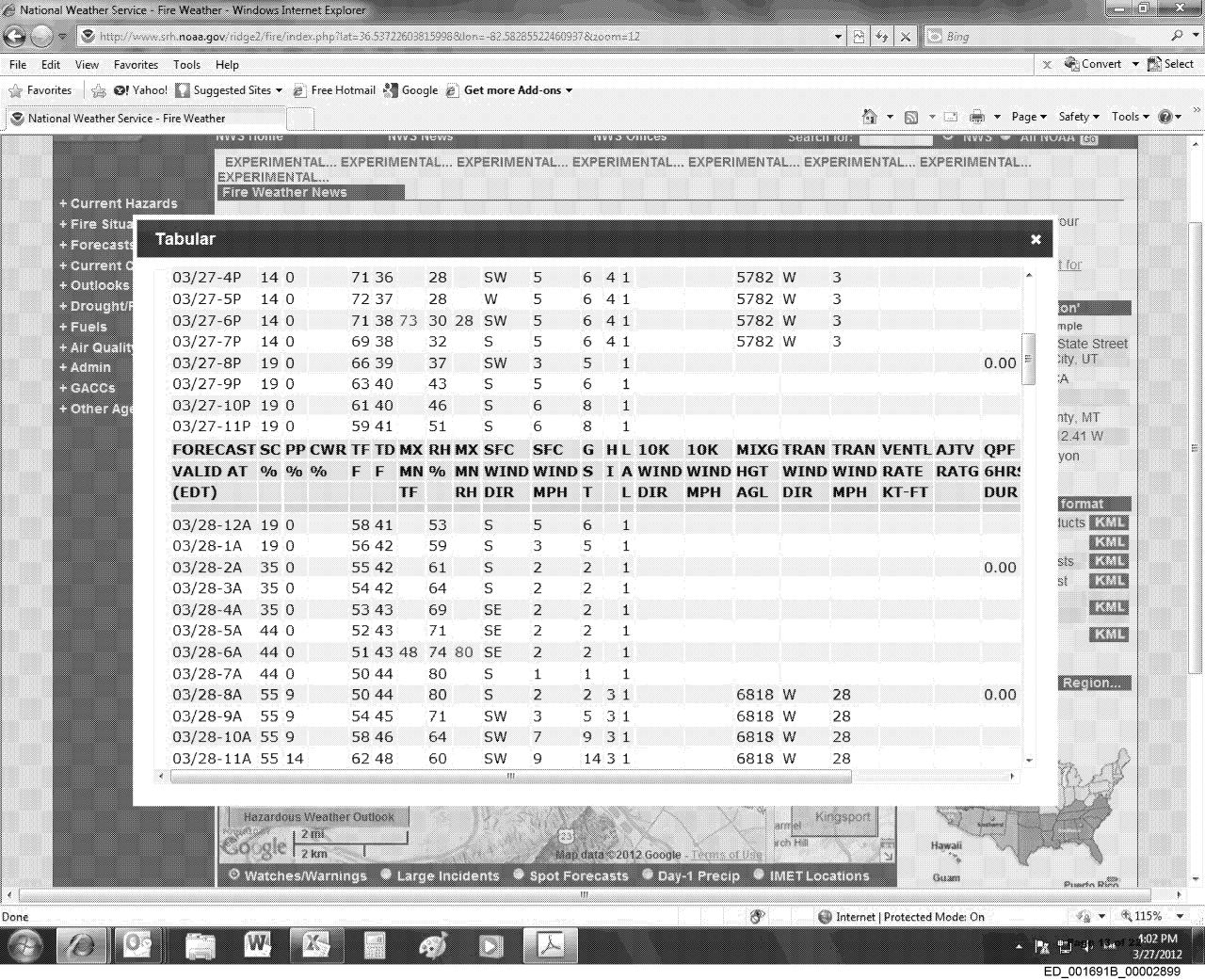
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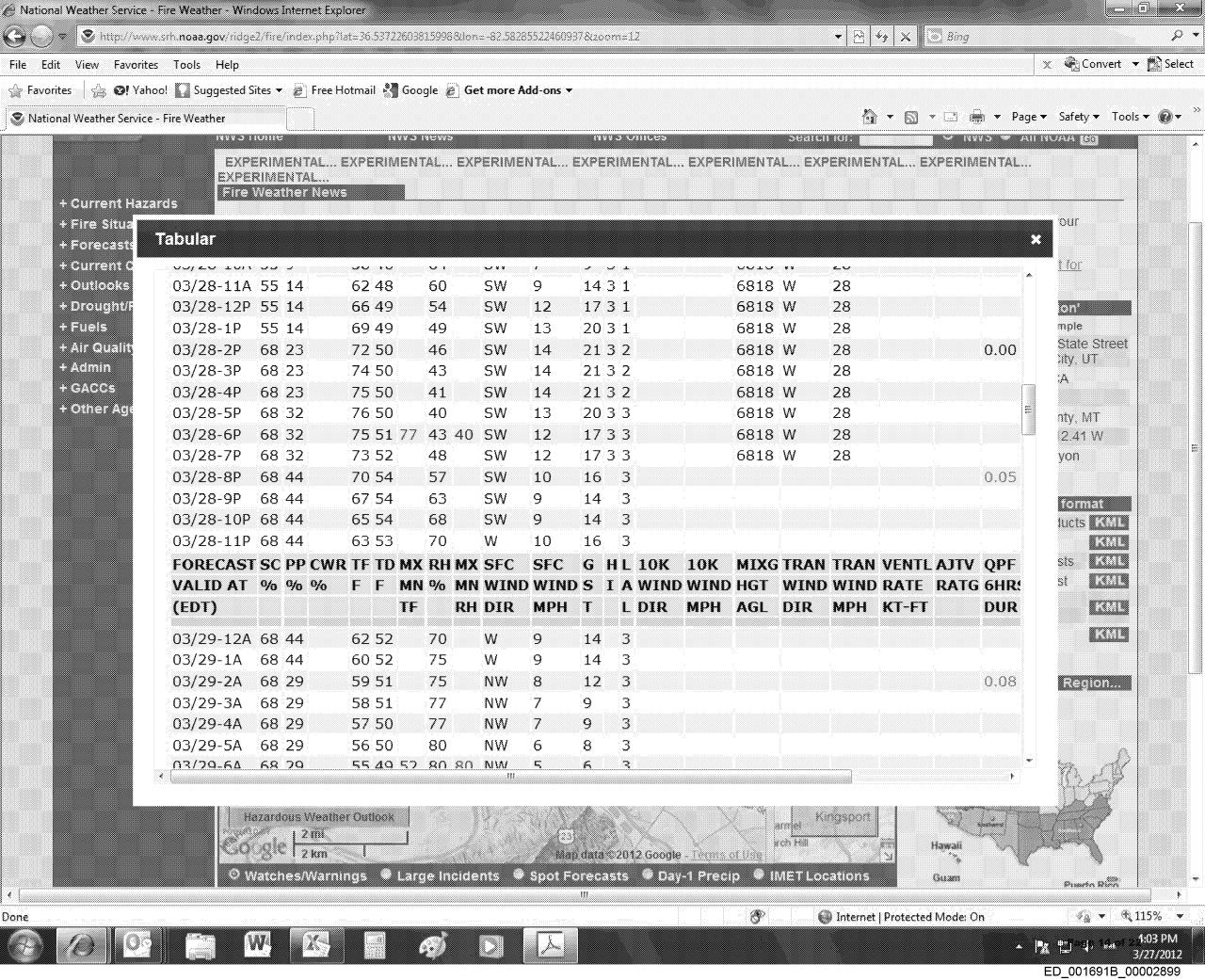
HIGH PRESSURE WILL CONTINUE OVER THE SOUTHERN APPALACHIAN REGION TONIGHT...BUT WILL GRADUALLY WEAKEN AS A COLD FRONT APPROACHES THE AREA ON WEDNESDAY. CLOUDS WILL BE ON THE INCREASE AFTER SUNRISE...WITH A CHANCE OF SHOWERS AND THUNDERSTORMS BY THE AFTERNOON HOURS. PRECIPITATION CHANCES TAPER OFF ON THURSDAY MORNING...AS THE FRONT MOVES TO OUR SOUTH. WARM AND DRY CONITIONS RETURN FOR THURSDAY AFTERNOON AND FRIDAY.

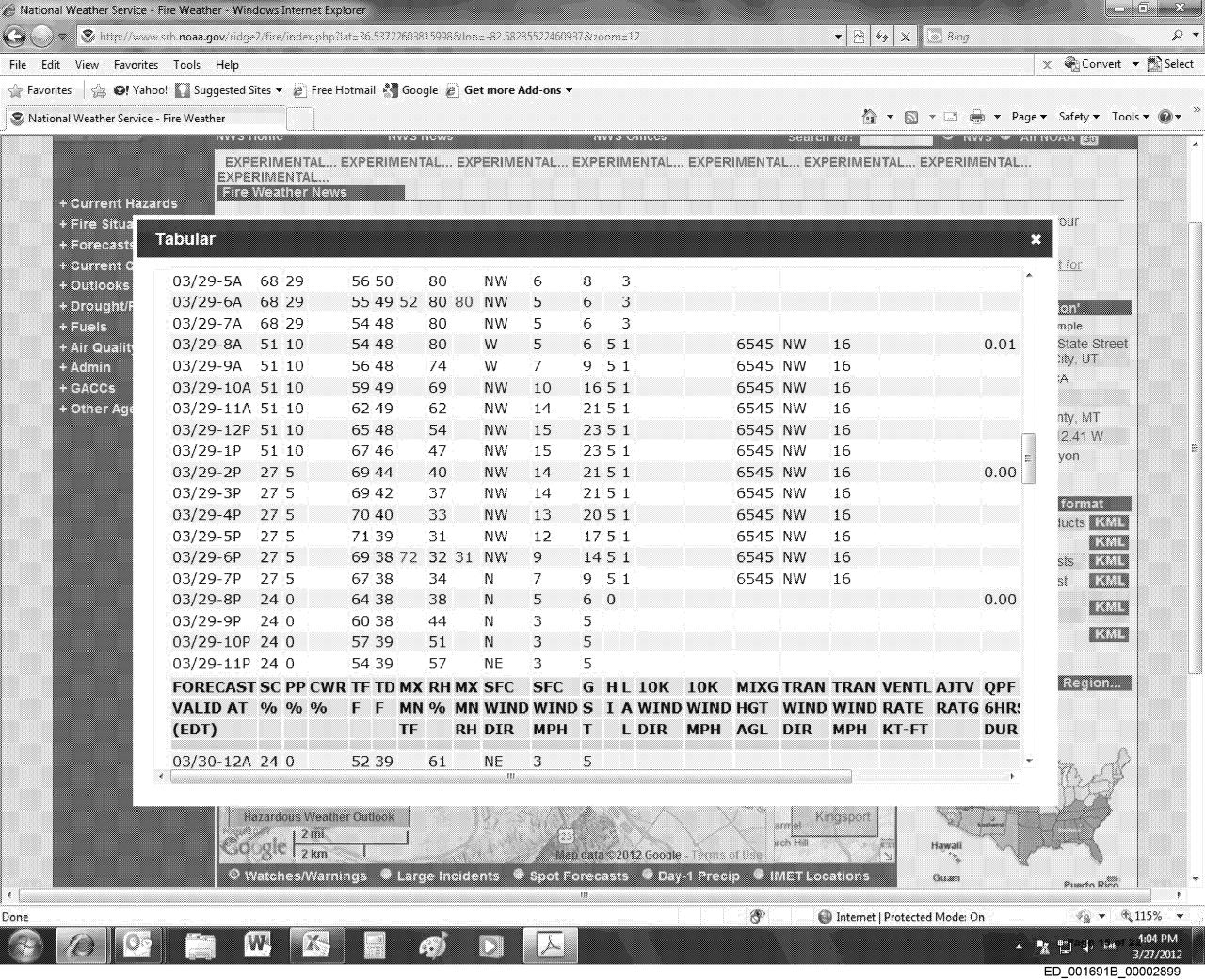
National Weather Service
Morristown, TN Weather Forecast Office
5974 Commerce Blvd.
Morristown, TN 37814
(423) 586-3771
Page Author: MRX Webmaster
Web Master's E-mail: sr-mrx.webmaster@noaa.gov

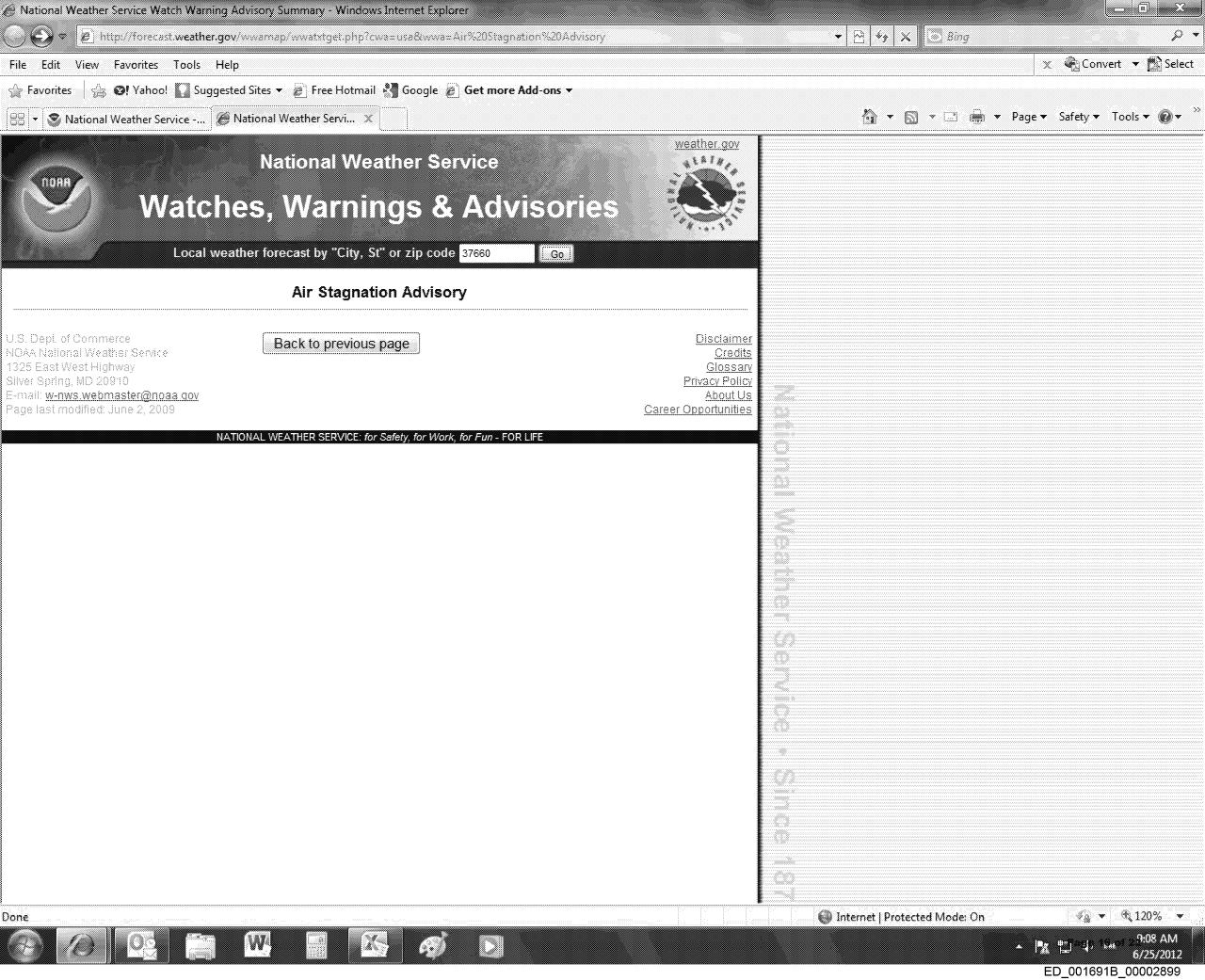
Page last modified: Feb 22nd, 2011 18:19 UTC

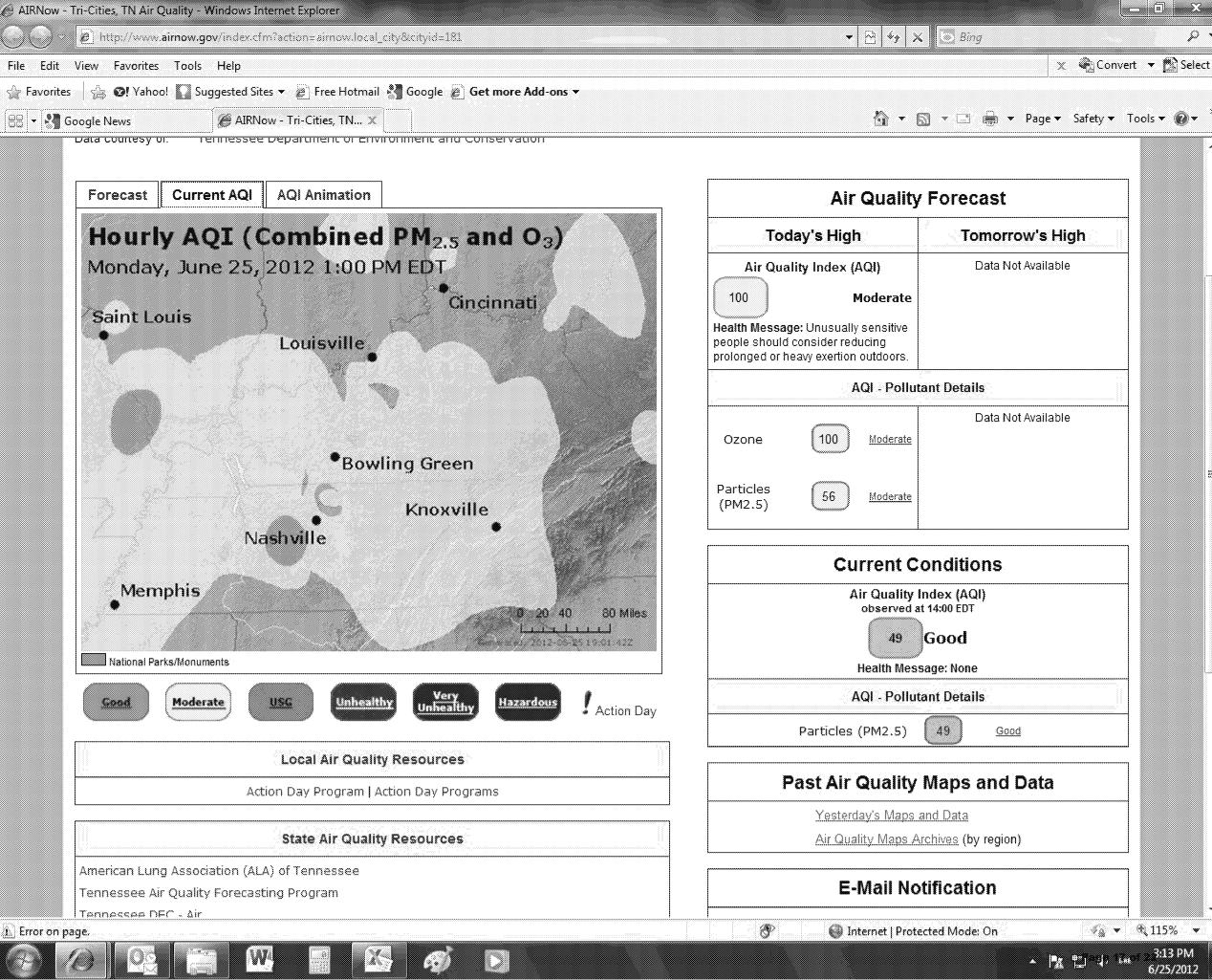
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Routine Fire Wx Fcst (With/Without 6-10 Day Outlook) Tennesee Forestry District 1

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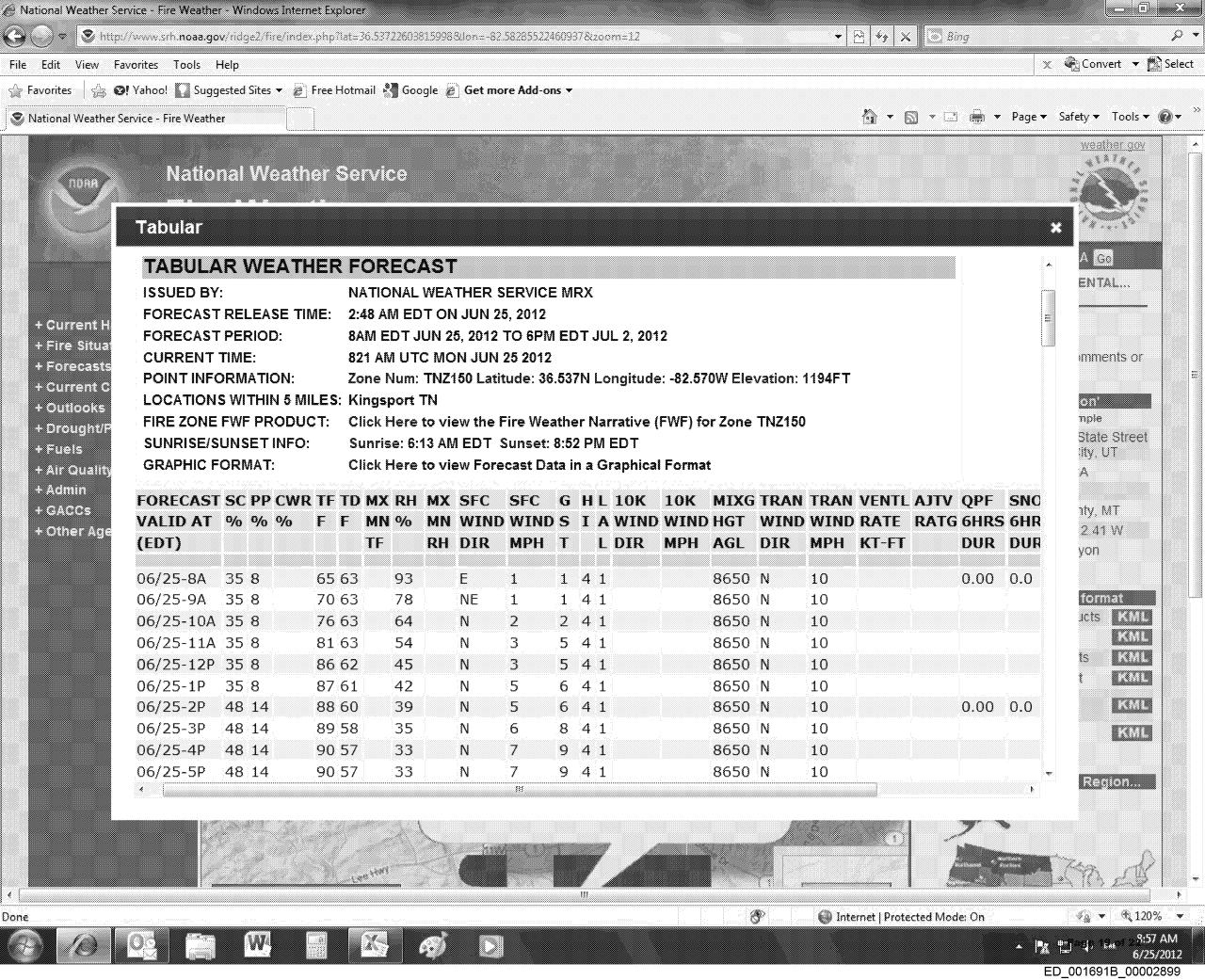
FIRE WEATHER PLANNING FORECAST FOR EAST TENNESSEE...SOUTHWEST VIRGINIA...AND EXTREME SOUTHWEST NORTH CAROLINA NATIONAL WEATHER SERVICE MORRISTOWN TN 251 AM EDT MON JUN 25 2012

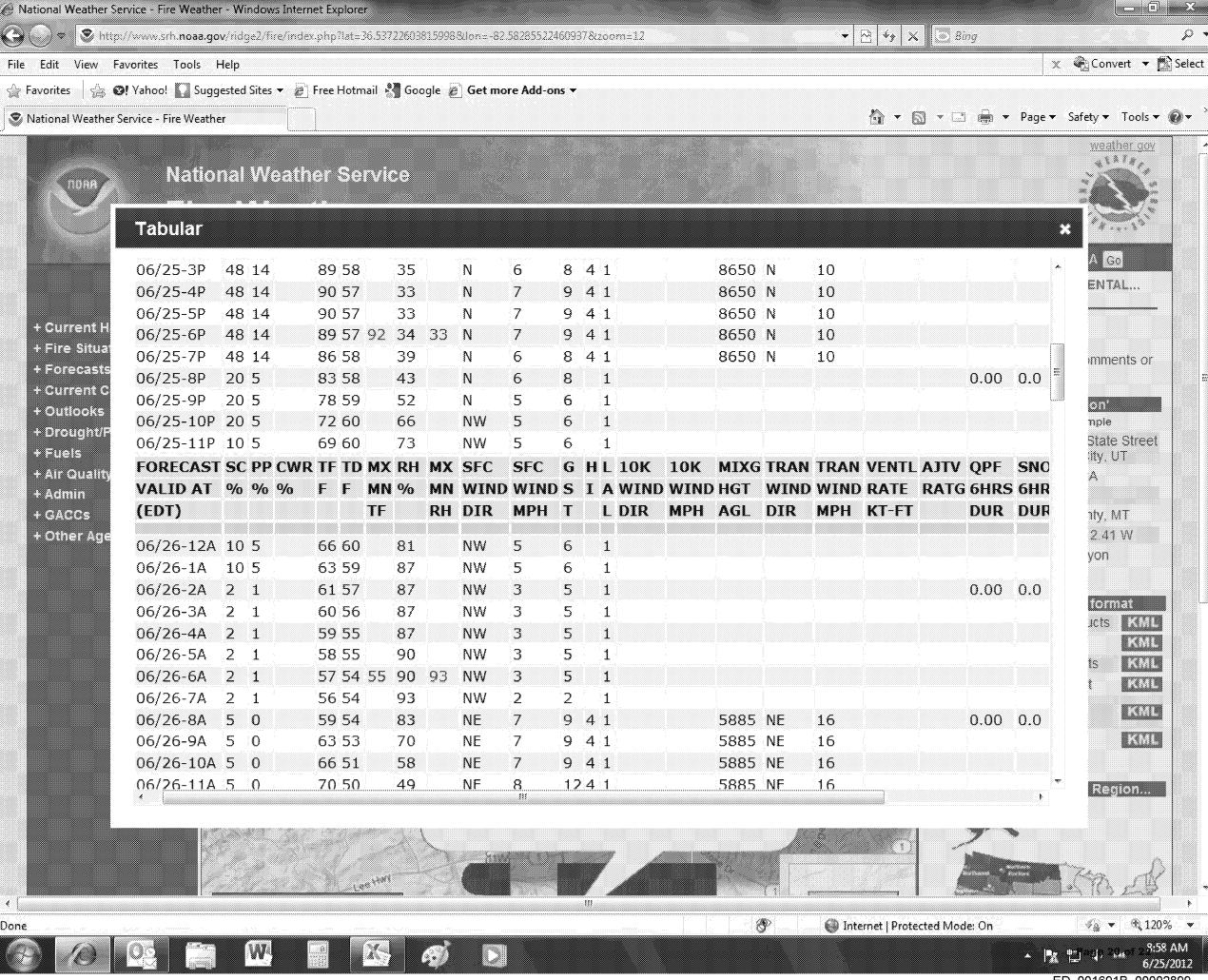
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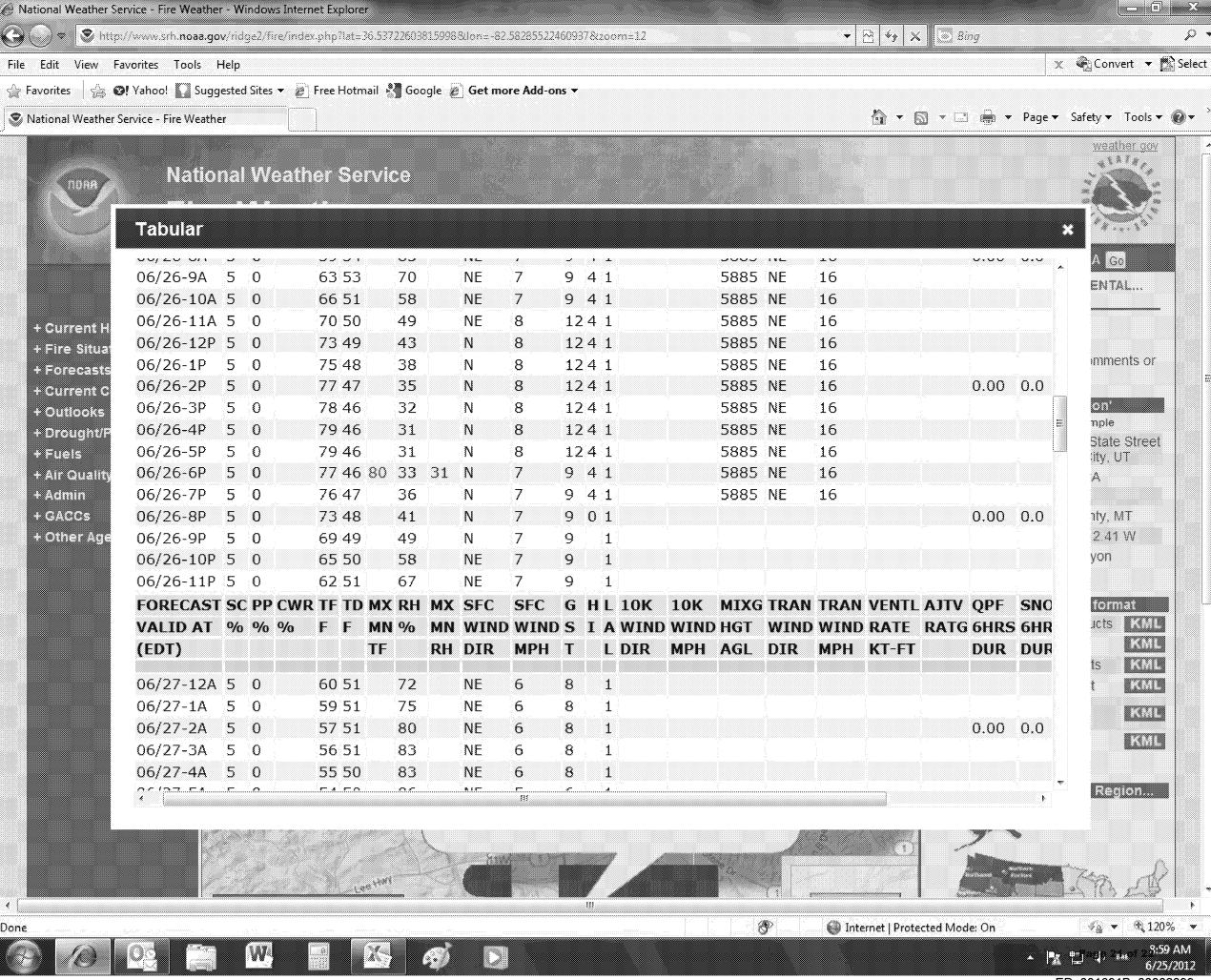
A DRY COLD FRONT WILL SWING THROUGH THE AREA TODAY...USHERING IN A BRIEF SHOT OF COOLER AIR. HIGH PRESSURE WILL BUILD IN BEHIND THE FRONT.

National Weather Service Morristown, TN Weather Forecast Office 5974 Commerce Blvd. Morristown, TN 37814 (423) 586-3771 Page Author: MRX Webmaster

Web Master's E-mail: sr-mrx webmaster@noaa.gov Page last modified: Feb 22nd, 2011 18:19 UTC <u>Disclaimer</u> <u>Credits</u> <u>Glossary</u>







EAE SYSTEMS Ordnance Systems Inc. HSAAP

Air Dispersion Tool for Burn Events

Instruction: Enter data in the cells below based on the proposed burn date and information obtained from Linked websites for Kingsport, TN location

